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## **Immigration Law**

## Guerra-Marchorro v. Holder, No. 13-1922

Petitioner was properly denied asylum and withholding of removal, where the record provides sufficient evidence to support the Immigration Judge's factual finding that petitioner failed to "establish a viable nexus" between the "persecution" he identifies and the "particular social group" to which he claims to belong.

# **Immigration Law**

#### Lamim v. Holder, No. 13-2451

The Board of Immigration Appeals (BIA) properly denied petitioner's request to alter his permanent resident status so that it would no longer be conditional, where substantial evidence supports the BIA's finding that petitioner did not make the showing that he entered his marriage to a U.S. citizen in good faith.

#### Attorney's Fees, Banking Law

## Santander Bank, NA v. Warrender, No. 13-1476

The district court's denial of a motion to enforce an attorney's lien in an underlying mortgage dispute is affirmed, where the district court properly concluded that defense counsel is not entitled to enforcement of his attorney's lien against the proceeds of the sale of defendant's property.